

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Anastacio Lemus Lopez,

17-CV-01179 (PAM/TNL)

Plaintiff,

vs.

Minneapolis Police Officers Russell Cragin, Anthony Rodin, Michael Grahn, Michael Fossum, Stephen McCarty, and Gerald Moore; Minneapolis Chief of Police Janeé Harteau; City of Minneapolis; Sheriff Richard W. Stanek; Hennepin County Attorney Michael O. Freeman; Hennepin County; Hennepin County Administrator David J. Hough; Monterrey Security Consultants, Inc.; Andrew Hodynsky; SMG; Minnesota Sports Facilities Authority; Minnesota Vikings Football Stadium, LLC; and Minnesota Vikings Football, LLC,

REQUESTS FOR PRODUCTION OF DOCUMENTS BY CITY OF MINNEAPOLIS DEFENDANTS, SET II

Defendants.

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TO: Plaintiff Anastacio Lopez, through his attorneys, Michael S. Martinez and Courtney Burns, Martinez Hsu, P.C., 1601 E. Lamar Blvd., Ste. 114, Arlington, TX 76011, and Michael P. Nadimi, The Nadimi Law Group, 80 South 8<sup>th</sup> Street, Suite 900, Minneapolis, MN 55402

Defendants Russell Cragin, Anthony Rodin, Michael Grahn, Michael Fossum, Stephen McCarty, Janeé Harteau, and the City of Minneapolis (collectively, "City of Minneapolis Defendants" or "City Defendants"), request

under Rule 34 of the Federal Rules of Civil Procedure, within the time period prescribed by law, legible copies of the following. Please take notice that Rule 26 of the Federal Rules of Civil Procedure requires these requests to be treated continuing and any additional or corrective information you receive relating to the subject matter of this discovery must be produced. **City Defendants will object at the time of trial to any attempt to introduce evidence sought by these Document Requests and not timely disclosed.**

#### **INSTRUCTIONS AND DEFINITIONS**

1. The term "statement" means any written statement, signed or otherwise adopted, ratified or approved, either expressly or impliedly, by the person making it or any stenographic, mechanical, electrical, photocopy or other recording or record or transcription which is substantially a synopsis or verbatim recital of an oral comment or statement by the person making it and contemporaneously recorded.

2. The term "trial exhibit" means each and every document, record, photograph, chart or other thing created or intended for the purpose of being introduced as an exhibit at trial, and includes items of demonstrative evidence which you intend to use in support of any substantive evidence you will seek to introduce at trial.

3. The term "document" has the broadest possible definition under Fed. R. Civ. P. 34, and includes all documents in possession of responding parties or their attorneys of record.

4. The terms "you" or "your" means the responding party and each employee, agent, or representative (including attorneys), and all other persons acting or purporting to act on your behalf.

5. The term "Complaint" means the latest version, as amended, of Plaintiff's Complaint, filed in the United States District Court for the District of Minnesota, under the Court File No. 17-CV-01179 (PAM/TNL). At time of service, this was the Amended Complaint, ECF Doc. No. 93.

6. The term "Social Networking Account" means any social media account that You have, including but not limited to Facebook, Instagram, Snapchat, Tumblr, Twitter, YouTube, etc.

7. An evasive or incomplete answer is deemed to be a failure to answer within the meaning of Rule 37.01(a)(4) of the Federal Rules of Civil Procedure.

8. Per Rule 34(b) of the Federal Rules of Civil Procedure, unless otherwise specified or agreed, please provide all electronically stored information on a CD/DVD in searchable .pdf format, with each document as a separate .pdf, and produce all spreadsheets (such as Excel files), PowerPoints, audio files, and video files in their native formats.

**REQUEST FOR PRODUCTION OF DOCUMENTS**

17. To Plaintiff: For each Social Networking Account you have, please produce a copy of each page, photograph or video that includes you for the period beginning two years before the subject incident up to (and including) the present.
18. To Plaintiff: Where available, please produce an electronic, native copy of the information available on each page of your Social Networking Accounts for the period of time beginning two years before the incident, up to (and including) the present. For example, for your Facebook account (if you maintain one), log in to Facebook, click on the down arrow symbol at the top right of your home page and select "Settings;" then, click "Download a copy of your Facebook data" which appears just below your General Account Settings; finally, click "Start My Archive." Facebook will notify you via email when your page is available for download.
19. To Plaintiff: Documents showing your purchases on December 1, 2016, including but not limited to receipts, or debit or credit card statements.

Dated: 5/1/18

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*Attorneys for Defendants Russell Cragin,  
Anthony Rodin, Michael Grahn, Michael  
Fossum, Stephen McCarty, Gerald Moore;  
Janeé Harteau, and City of Minneapolis*

### Service List

Michael S. Martinez Courtney Burns Martinez Hsu, P.C. (Arlington Texas)  Michael Nadimi The Nadimi Law Group LLC	Plaintiff Anastacio Lopez
Genevieve LeFevour Kevin Pacini Johnson & Bell, Ltd. (Chicago IL)  Donald Heeman Daniel Robert Moses Haller Jessica Nelson Felhaber Larson	Monterrey Security Consultants Andrew Hodynsky SMG Minnesota Vikings Football Club, LLC Minnesota Sports Facility Authority (MSFA)
Sara Lathrop Ivan Ludmer Minneapolis City Attorney's Office	City of Minneapolis Anthony Rodin Russell Cragin Michael Fossum Michael Grahn Janee Harteau Stephen McCarty Gerald Moore
James W. Keeler, Jr. Christiana M. Martenson Assistant Hennepin County Attorneys	Defendants Hennepin County, David J. Hough, Michael O. Freeman, and Richard W. Stanek